



## UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

Civil Division

TAIMING ZHANG

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ANDREW JOSEPH BONOMOLO

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

23cv627

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	TAIMING ZHANG
Street Address	801, No. 21 Taishan Lane, Zhongshan District
City and County	Dalian, Liaoning
State and Zip Code	CHINA 116000
Telephone Number	+8618604267322
E-mail Address	nick.705073604@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

ANDREW JOSEPH BONOMOLO

Job or Title *(if known)*

Street Address

342 Chatham Forest Drive

City and County

Pittsboro, Chatham county

State and Zip Code

NC 27312

Telephone Number

9842488104

E-mail Address *(if known)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Fifth amendment banning undue stripping of property and health

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, Taiming Zhang, is a citizen of the State of *(name)* CHINA.

**b. If the plaintiff is a corporation**

The plaintiff, \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* ANDREW JOSEPH BONOMOLO, is a citizen of the State of *(name)* NC. Or is a citizen of *(foreign)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

1,000,000 USD claimed for serious debilitating emotional distress, medically diagnosed, unable to work or study, and for fraud/breach/non-delivery and punitive damages

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Andrew Joseph Bonomolo, alias Troye Jacobs, scammed my money and ruined my life. In October 2020, he sold me a Skype session where he agreed to teach me his "secrets", he took money for it, and after disappearing at 3 or 4 scheduled times, he fully disappeared. Before he fully disappeared, I conveyed to him that because a) I need the secrets, b) I had special feelings for him and him hurting me will be particularly painful, c) I was already weak and vulnerable and psychologically unwell and further disappearing will cause SERIOUS consequences to me, d) I really hope he would not disappear, him further disappearing will cause serious harm to me. During and after the communication for that session, he repeated, directly and indirectly, told me to kill myself. After his disappearance, I contacted him multiple times for him to deliver what he took money for which he never delivered, and he either does not respond, or responds with sheer abuse, most often telling me to kill myself or stating he does not care about me i.e. the consequences he causes by denying me the secrets, which is medical depression and anxiety, or he would laugh at my mental disability caused SOLELY by him. All of this has caused extremely serious consequences. I dropped out of school (university) and was diagnosed with mild and moderate medical depression and anxiety. It's been almost three years and I still cannot work or study. As I had special feelings for him, him not regretting or paying for what he did has in all essence disabled and paralyzed me. As he was told specifically of the potential consequences, he knew exactly what further disappearance would do, because he was literally TOLD OF IT before he disappeared, this is intentional infliction of emotional distress. He was very much intentional, or at least reckless in causing my pains. In fact his intention is somewhat more confirmed as he would come back and apologize the first few times he disappeared, but disappeared and blocked me on the platform fully AFTER he was told of how weak I was. It was a targeted attack.  
Details and exhibits will be filed later.

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#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1,000,000 USD claimed for serious debilitating emotional distress, medically diagnosed, unable to work or study, and for fraud/breach/non-delivery and punitive damages

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#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I declare under penalty of perjury under the laws of the United States of America that the foregoing are true and correct.

##### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/24/2023

Signature of Plaintiff

Printed Name of Plaintiff

  
\_\_\_\_\_  
TAIMING ZHANG